

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CRIMINAL NO. 04-10135-GAO

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                        )  
UNITED STATES OF AMERICA )  
                        )  
v.                      )  
                        )  
JILL DOUCETTE         )  
                        )

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MOTION FOR LEAVE TO FILE SENTENCING  
MEMORANDUM ONE DAY LATE

The defendant, Jill Doucette, hereby respectfully requests this Honorable Court to allow her leave to file her Sentencing Memorandum one day late. The defendant states the following grounds in support of this motion:

1. Defense counsel did not receive the initial draft PSR in this case until February 27, 2006. Although it was apparently mailed on February 7, it never arrived in the mail and counsel obtained a copy from Probation via fax on February 27.

2. Upon receipt of the initial draft PSR, counsel immediately mailed a copy to the defendant, and within one weeks' time prepared and transmitted the defendant's objections to Probation.

3. Defendant's counsel has another sentencing hearing scheduled for the same day as the hearing in this matter, and thus the sentencing memoranda were both due

under the orders of both courts on the same day, which was March 9, 2006.

4. Despite counsel's best efforts, she was unable to complete and file both sentencing memoranda on that date, and thus is submitting the memorandum in this case one day late.

WHEREFORE, the defendant respectfully requests this Honorable Court to accept the defendant's Sentencing Memorandum for filing one day late.

Respectfully submitted,

JILL DOUCETTE  
By her Attorney,

/s/Leslie Feldman-Rumpler  
Leslie Feldman-Rumpler, Esq.  
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CERTIFICATE OF SERVICE

I, Leslie Feldman-Rumpler, hereby certify that I have caused a copy of the within document to be transmitted electronically to AUSA David Tobin this day.

3/10/2006  
Date

/s/Leslie Feldman-Rumpler  
Leslie Feldman-Rumpler, Esq.